

draft draft draft draft

February 27, 1992

Dan Bauer, Plant Manager
Akzo Salt of Utah
1428 James Palmer Road
Lake Point, Utah 84074

Dear Mr. Bauer:

Re: Review of Notice of Intent to Conduct Large Mining Operations, Akzo Salt of Utah, Timpie Solar Ponds, M/045/030, Tooele County, Utah

The Division has performed a review of Akzo's December 2, 1991 response to our preliminary review. This is a draft version of Division review comments. A final version will follow which may contain some additional requirements. The following questions will need to be addressed before final approval can be considered. Each question has been formatted according to the section of the Minerals Rules to which it applies. Please format your response in a similar fashion.

R647-4-105. Maps, Drawings & Photographs

105.2.12 Border outlining acreage

(AAG) While Akzo did provide additional maps which detailed the surface and plant facilities, the maps did not contain a clearly defined disturbed area boundary. The response letter indicates that approximately 100 acres are or will be disturbed at the plant site. This figure is not substantiated by the breakdown on the map labeled "Salt Washing Plant & Related Facilities". Please clarify which areas are included under the headings used by adding boundaries to the maps submitted. A hand drawn boundary may be acceptable.

105.3 Additional maps, drawings or photographs

(HWS/AAG) A more extensive reclamation treatments map needs to be provided. The map should show the entire mine site and be of a scale which can be compared with the operations map. All disturbed areas need to be clearly identified on this map along with the

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type of reclamation treatments to be applied in each area. This map would also show areas which will not receive any reclamation treatments. These unreclaimed areas should correspond to all variance requests submitted. Areas defined on this map would correspond to areas used in the surety calculations.

R647-4-106. Operation Plan

106.5 Description of existing soils

(HWS) More specific information regarding the existing soils which are to be disturbed by mining needs to be provided. General soils information is not sufficient. The question being asked is, are disturbed soils associated with the mine site reclaimable? If they are not reclaimable, please substantiate this, otherwise the Division will require reclamation of these areas.

R647-4-110. Reclamation Plan

110.5 Planting program

(HWS) Akzo did not address the previous comment (5-5-91) in this portion of the rules. A definitive seed list needs to be placed in the permit which includes the species specified in our earlier correspondence. These species were Alkali Sacaton, Crested Wheatgrass, Four Wing Saltbush, Rabbitbrush, Sagebrush and Yellow Sweetclover.

R647-4-111. Reclamation Practices

111.1.8 Roads & pads

(AAG) Akzo's SWPRF drawing lists acreages associated with roads, but the map does not clearly identify which roads are included in these figures. Please identify these areas with a definitive border or description.

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R647-4-112. Variances

(HWS) Akzo has not addressed the previous comment by the Division regarding a topsoil variance for the facilities area. Unless this variance request is justified, Akzo will be expected to retopsoil all portions of the facilities area, other than the solar ponds.

The Division will grant the additional dikes variance from the reclamation requirements. These dikes are to be eroded by the natural wave action of the lake waters with the gates left open at the time of final reclamation.

The truck scales, substation, vehicle maintenance shop and processing building have a viable post-mining use, in the opinion of the Division. These structures will be allowed to remain and are granted a variance from the reclamation requirements.

The remaining structures/features described in Akzo's 12-2-91 response will need to be reclaimed. These are specifically: the wash plant, stacker conveyor and stockpile foundations. These items will need to be included in the reclamation estimate if they are not already.

R647-4-113. Surety

(AAG) In order for the Division to adequately review the surety estimate presented by Akzo, the information requested in this letter will need to be received and reviewed. More specifically, the acreages (corresponding to the reclamation treatments map) for the various areas to be reclaimed which were used in Akzo's estimate will be needed. In addition, Division policy would include a mobilization cost and then add a contingency of 10% of the subtotal. The subtotal would then be escalated five years into the future, i.e. 1997 dollars. This total would be the surety amount requested by the Division.

R647-4-115 Confidential Information

(AAG) The Division will protect all documents which Akzo has labeled as confidential. This information will not be a matter of public record until a written release is received from Akzo, or until the notice of intention is terminated.

*Should gates
be pulled?
or buried*

*Tom,
This may
be viable, but
we have no
proof presently,
therefore we
should
bond for
removal
unless we
receive approp.
documentation to
substantiate
post-mining use.*

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R647-4-116. Public Notice & Appeals

(AAG) After the Division has received and reviewed the information requested here, a tentative approval will be issued (provided all matters are resolved) and the matter will go into the 30-day public comment phase. After or during this phase, the Division will present the amount and form of surety to the Board for approval. In order to present the surety to the Board, a complete and correct Reclamation Contract will be needed from Akzo. A copy of the Reclamation Contract and instructions for its completion are enclosed.

Thank you for your copy of the Reclamation Contract and instructions for its completion.

Sincerely,

Please contact me by phone if you have any questions or need any help.

D. Wayne Hedberg
Permit Supervisor
Minerals Regulatory Program

jb
Enclosure
M045030

OK / will be on